

# EXHIBIT 2

**From:** Jon Marko <[jon@jmarkolaw.com](mailto:jon@jmarkolaw.com)>  
**Sent:** Tuesday, March 24, 2020 2:24 PM  
**To:** Robert Carollo <[rcarollo@kirkhuthlaw.com](mailto:rcarollo@kirkhuthlaw.com)>  
**Cc:** Raechel Badalamenti <[rbadalamenti@kirkhuthlaw.com](mailto:rbadalamenti@kirkhuthlaw.com)>  
**Subject:** Re: Murray v City of Warren, et al

Hi Robert:

Just following up on my email below.



Jon Marko  
**MARKO LAW, PLLC**  
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**From:** Jon Marko <[jon@jmarkolaw.com](mailto:jon@jmarkolaw.com)>  
**Sent:** Monday, March 23, 2020 10:40 AM  
**To:** Robert Carollo <[rcarollo@kirkhuthlaw.com](mailto:rcarollo@kirkhuthlaw.com)>  
**Cc:** Raechel Badalamenti <[rbadalamenti@kirkhuthlaw.com](mailto:rbadalamenti@kirkhuthlaw.com)>  
**Subject:** Re: Murray v City of Warren, et al

Robert:

In reviewing your discovery answers, there are several answers that need to be supplemented. Please See below. Please let me know your position so we can determine if we need court intervention to decide some of these. I think alot of these we should be able to agree on.

**Interrogatory:**

- #2) We asked for witness information that goes beyond the initial disclosures. You simply refer to the initial disclosures, but don't answer the rest of the question.

- #8, #10, #17) You do not answer this interrogatory regarding other discrimination claims. We both know there are many other discrimination claims against the Defendants that have been made. Please answer these questions.

**Request for Production:**

- #14 - 15) I need his payroll and income tax records and W-2 statements to calculate economic loss. This should be a relatively easy thing for the City to produce. Please produce them.
- #16) You do not answer this question and you do not produce a privilege log.
- #17) You did not produce any discrimination complaints against Jere Green.
- #18) You do not produce the personell files of anyone by claiming they are not maintained. There has to be some employment documents for these individuals that would normally be in a file. Please produce it.
- #20) All investigation materials related to Plaintiff. If you do not have any, you need to say that. Otherwise, this needs to be produced.
- #24, #25) Emails: Please produce the emails.
- #26) Cell Phones: Will you agree to an inspection of work provided cell phones?



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**From:** Robert Carollo <[rcarollo@kirkhuthlaw.com](mailto:rcarollo@kirkhuthlaw.com)>  
**Sent:** Friday, March 20, 2020 4:52 PM  
**To:** Jon Marko <[jon@jmarkolaw.com](mailto:jon@jmarkolaw.com)>  
**Cc:** Raechel Badalamenti <[rbadalamenti@kirkhuthlaw.com](mailto:rbadalamenti@kirkhuthlaw.com)>  
**Subject:** Murray v City of Warren, et al

Jon,

We've mailed our Discovery Responses along with two discs of records. I've attached a digital copy of the responses hereto via the below cloud link.

Also attached are Discovery Requests directed to the Plaintiff also via the below cloud link. Please let me know if you have any questions, thank you.

You can view "First RTAs RTPs and Interrogatories to Plaintiff.pdf" at:

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Ascds%3AUS%3A5514f834-ab79-4145-a40f-4c06af6e7a63>

You can view "Warren – Murray Discovery Response.pdf" at:

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Ascds%3AUS%3Aa6f0a383-6663-48b2-859f-d1b6b378385f>

**Robert T. Carollo Jr.**  
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